



Roy F. Weston, Inc.
11840-D Kempersprings Drive
Cincinnati, Ohio 45240-1640
513-825-3440 • Fax 513-825-3336

24 April 1997

Mr. Paul Steadman, M.P.H.
U.S. EPA Region 5
77 West Jackson Boulevard
SE-5J
Chicago, IL 60604

EPA Region 5 Records Ctr.



247422

RE: Administrative Order of Consent: GHR Foundry: Dayton, Ohio
Revised Work Plan

Dear Mr. Steadman:

On behalf of our client, Foundry Sales & Supply, Inc. (FSSI), Roy F. Weston, Inc. (WESTON®) is submitting a Revised Work Plan (Work Plan) for U.S. EPA review and approval of the required activities at the GHR Foundry Site, 400 Detrick Street, Dayton, Ohio.

The text of the Work Plan has been revised to address specific concerns stated in your Work Plan comments letter dated 9 April 1997. The following responds to some of your concerns and is a narrative discussion of the changes and/or specific direction to where such additions or modifications can be found in the revised document.

Site Renovation and the Incorporation of Brownfield Initiatives:

One of the concerns expressed in the comments regarded site restoration and redevelopment. As we discussed in our meeting at the site on 5 February 1997, and as expressed by FSSI through discussions with U.S. EPA and the City of Dayton, FSSI intends to utilize developmental and economic incentives associated with successful completion of the Ohio Voluntary Action Program (VAP). The brownfield development incentives are available primarily through the Ohio Department of Development for entities that have obtained a Covenant Not to Sue from Ohio EPA via the VAP. For a site to meet VAP eligibility requirements it must be free and clear of all other environmental regulations and orders, including the TSCA, CERCLA, Ohio Bureau of Underground Storage Tank Regulation (BUSTR), and the Ohio Cessation of Regulated Operations (CRO) rules. Our intent is to obtain closure of the Administrative Order of Consent (AOC) signed by FSSI on 21 February 1997, and to then determine the appropriate action to obtain a Covenant Not to Sue from Ohio EPA.

Further, FSSI is working closely with the City of Dayton to ensure that the GH&R property becomes an economically functional part of the community. In a hearing of the Dayton Nuisance Abatement Board on 19 February 1997, FSSI made a commitment to the City to not only address





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the issues outlined in the AOC, but to also clear the property of debris and non-functional structures. In return, the City agreed in principle to work with FSSI in redeveloping the property.

During our 5 February meeting you emphasized that the Work Plan should specifically address the three waste streams identified in the AOC: asbestos, PCBs, and volatile organic compounds (VOCs). These waste streams were located on site in the former office building: in drums, bags, and electrical equipment in former plant G; and in six underground storage tanks (USTs) located on site. As required in the AOC, the Work Plan describes WESTON's approach to identifying, securing, removing, and disposing of these identified wastes. WESTON and FSSI have also obtained bids for most of the site clearing and demolition work, and FSSI plans to proceed with this activity once the immediate hazards associated with the AOC wastes have been mitigated.

Safety of Adjacent Properties:

Section 2.2 of the Draft Work Plan has been revised to summarize the air monitoring and dust control methods to be employed at the site during the sampling and removal actions required by the AOC. This section also outlines an innovative method of mitigating vehicular migration of chemical compounds from the site, and describes measures being taken to ensure protection of local groundwater and surface water resources.

Health and Safety Plan (HASP):

The HASP has been modified to show only the essential streets necessary to travel from the site to the hospital. This route has been traveled by a WESTON employee for confirmation. Upon U.S. EPA approval of the Work Plan, the local hospital will be notified of the scheduled removal actions.

Data Quality Objectives (DQOs):

The objective of this Work Plan is to provide the specific sampling and analytical protocol necessary to support the removal actions outlined in the AOC. As stated in the AOC, Quality Assurance/Quality Control (QA/QC) must be appropriate to support Level 2 DQOs for identification of known contamination at the site. This Work Plan and associated appendices have been prepared to support the required characterization of wastes identified in the AOC and supporting reports. The plan is also written to uphold the federal, state and local Applicable Relevant and Appropriate Requirements (ARARs) during each phase of the sampling and removal process.



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Work Plan Specific Comments

The following discussion is in reference to specific comments that begin on page 3 of your 9 April letter.

Introduction, Page 1-2, Section 1.3:

The Introduction has been revised to include reference to the Toxic Substances Control Act (TSCA) citations and complaints that have been issued for this Site. A reference to the Ohio CRO citation is also included.

Part 2, Scope of Work:

The Scope of Work has been revised to reference the rationale behind composite sampling of the UST's. This reasoning is discussed in the third paragraph of Section 3.1 of the Sampling and Analysis Plan (SAP).

Page 2-5, First and Second Paragraphs:

Sections 3.1 and 3.2 of the SAP have been revised to include a detailed description of field screening techniques.

Page 2-5, Fourth Paragraph:

The text has been revised to include a description of subcontractor selection criteria.

Page 2-6, Section 2.2.3:

This section has been reorganized to clarify disposal intent and eliminate confusion.

Page 2-7, Section on Capacitors:

The text has been revised to include the pertinent regulatory citation.

Page 2-8, Third Paragraph:

The text has been revised to identify the air quality monitoring to be performed during the performance of the specific removal action.



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Part 3, Reporting, Page 3-1:

The text has been revised.

Part 4, Schedule, Page 4-1, Figure 4:

The schedule has been revised.

APPENDIX A, Sampling and Analysis Plan

Figure 1, Site Location, Figure 2, Site Plan:

The quality of Figure 1 has been upgraded. The SAP now includes color copies of the USGS quadrangle map and a computer-generated CADD map provided by the City of Dayton. The location and proximity of the site to the Mad River is clear in these color copies.

Part 2, Project Organization and Responsibilities:

Figure 2-1, Project Team Organization:

The figure has been revised to streamline and more clearly define the reporting structure.

Part 3, Sampling Plan, Page 3-2:

The text has been revised to define the project specific laboratory qualification requirements for chemical testing of soil samples. As described above, it is FSSI's intent to utilize the Ohio VAP; therefore, it is imperative that an Ohio VAP Certified Lab be used to analyze all soil samples.

Part 3, Section 3.2, Room G:

The text has been revised to define the field screening tests for soil samples.

Page 3-3, Section 3.3, Transformers/Capacitors:

The text has been revised to reflect revised PCB sampling techniques that are meant to ensure sample integrity.

Page 3-4, Section 3.4, Building Materials:

The text has been revised to reflect 24-hour turnaround on area air samples and prompt review and response. The Air Monitoring section of the HASP has been revised to include area and personal air sampling requirements.



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Part 4, Analytical Program:

The accuracy of field screening tests cannot, in most cases, be determined for multi-component systems. An evaluation of each field test has been provided below.

Accuracy for the PID

The PID accuracy is dependent on both the target analyte and the relative abundance in the air. Because the instrument is being used to evaluate the presence of a number of non-specific volatile compounds instead of select compounds, the accuracy of the instrument can not be cited in this plan.

Accuracy of the PCB kits

Accuracy data for the PCB kits were not available from the manufacturer. The manufacturer did provide sensitivity data and a copy of draft SW-846 procedure 9079. Draft procedure 9079 provides error rates for the test kits. Because explicit accuracy data were not available, the text in the work plan has not been revised.

Accuracy of the Mini-RAM

The manufacturer's specifications for the instrument do not include accuracy data. The manufacturer can provide precision data of plus or minus 0.02 mg/m³. The text was modified to specify the manufacturer's specification for the precision of the instrument.

Accuracy of pH strips

The manufacturer did not have accuracy data. The manufacturer did have precision data. The precision data for pH strips, VWR Catalog number: EM9590-3, was plus or minus 0.5 pH units. The text in the Work Plan was modified to specify the manufacturer's specification for the precision of the pH strips.

Section 4.2:

As stated in the first sentence of Section 4.2, all non-asbestos samples collected for waste characterization analysis will be tested for the parameters listed in Table 4.1. This list is not an inventory. It is a list of the TCLP compounds and analytes necessary to determine the classification of the waste streams in accordance with RCRA and TSCA regulations.

The details of the sampling of the individual waste streams have been defined in the SAP as required by the AOC. The text has been revised to clarify the field screening procedures



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Part 5, Data Reduction, Reporting and Validation:

Page 5-1, Section 5.1.2:

The text has been revised to reflect the EPA accessibility of project data.

Section 5.4, Data Validation:

The following summarizes our telephone conversation of 22 April 1997 in which we discussed data validation.

The level of data quality assessment that includes data validation was not specified in the original Work Plan for two reasons. First, the consent order specifies a level 2 DQO. This level of quality assurance assumes that analytical data are being collected to confirm field measurements and does not require data validation. Second, the data being collected for this project are being used to classify waste for disposal. Because waste classification can withstand significant analytical error, it was judged that the data verification as described in Section 5.4 of the plan will adequately evaluate the data quality for waste characterization and disposal purposes.

Data verification is the process of evaluating the laboratory's adherence to reporting limits and quality control sample requirements. Data verification does not investigate data quality of calculations, compliance to calibration requirements, and data interpretation. Data verification is used for medium to low risk decision making.

Data validation includes the components of data verification and evaluates the quality of calculations, compliance to calibration requirements, and data interpretation. Data validation is typically used to confirm the quality of data which will be used for litigation, or for making high risk (human health, financial, etc.) decisions.

The text has been revised to indicate that 10 percent of the data collected for waste characterization (chemical analysis) will be submitted for data validation. Such data validation will be performed to verify that the laboratory has properly calculated the data results from the raw data, that the laboratory has properly interpreted spectra and/or chromatograms, that the laboratory has met the quality control requirements specified in the plan, and that the laboratory has properly followed the calibration procedures specified in this plan and the referenced method. Guidelines for the qualification of data based on data validation results have been included in the plan.



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Part 6, Quality Assurance/Quality Control:

The text has been revised to reflect the replacement of faulty instruments.

Page 6-24, Section 6.7.3.2:

The text has been revised to reflect EPA notification prior to controlled Work Plan deviations.

We look forward to receiving your approval of this Work Plan and are anxious to implement the clean up and restoration of the GHR Foundry site. If you have any questions regarding this submittal, please contact Michael May or me at (513) 825-3440.

Very truly yours,

ROY F. WESTON, INC.

Bradford S. White, Ph.D., PG
Senior Project Manager
Ohio VAP Certified Professional

BSW/mpm

Enclosures

cc: Mr. Jeffrey Cahn/U.S.EPA Region 5
Mr. Raymond Carcione/Foundry Sales & Supply, Inc.
Mr. Aaron Bulloff, Esq./Kadish, Hinkel & Weibel
Mr. Tom Buchan/Ohio EPA
Mr. Douglas Hall/City of Dayton